

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

FOSSA LTD., ICELANDICPLUS LLC and  
STEVEN BARLOW,  
Plaintiffs,

v.

I JIAN LIN and  
ENCOMPASS COMMUNICATIONS, INC.,  
Defendants,

Case No. **1:16-cv-11914**

**ASSENTED-TO MOTION FOR  
ADDITIONAL EXTENSION OF TIME TO  
RESPOND TO MOTIONS TO DISMISS  
FROM MARCH 2, 2017 TO AND  
INCLUDING MARCH 9, 2017**

I JIAN LIN and  
ENCOMPASS COMMUNICATIONS, INC.  
Counterclaim-Plaintiffs,

v.

FOSSA LTD., ICELANDICPLUS LLC, STEVEN  
BARLOW,

Counterclaim-Defendants,  
and

VALENTIN DAVID GURVITZ, ESQ.,  
BOSTON LAW GROUP, P.C., and SONYA  
LIVSHITS

Additional Counterclaim-Defendants.

Defendants/Counterclaim-Plaintiffs I Jian Lin and Encompass Communications, Inc., respectively request a brief additional extension of time to respond to the two separate Motions to Dismiss filed by Counterclaim-Defendants Fossa, Ltd., IcelandicPLUS LLC, Steven Barlow, and Additional Counterclaim-Defendants Valentin Gurvits, Esq., Boston Law Group, P.C., and Sonya Livshits. The additional extension is reasonably necessary to fully respond to the two motions to dismiss and due to family issues for undersigned counsel. Accordingly, Defendants/Counterclaim-Plaintiffs request an additional brief extension from the current deadline of March 2 to and including March 9, 2017.

Undersigned counsel has conferred with counsel for each of the Counterclaim-Defendants, who have assented to this motion.

**CONCLUSION**

For the foregoing reasons, Lin and Encompass respectfully request that the Court grant them to and including March 9, 2017, to respond to the two Motions to Dismiss.

Dated: February 28, 2017

Respectfully submitted,

/s/ Mitchell J. Matorin  
Mitchell J. Matorin (BBO#649304)  
Matorin Law Office, LLC  
18 Grove Street, Suite 5  
Wellesley, MA 02482  
T: (781) 453-0100  
F: (888) 628-6746  
E: [mmatorin@matorinlaw.com](mailto:mmatorin@matorinlaw.com)

*Counsel for Defendants and  
Counterclaim-Plaintiffs I Jian Lin and  
Encompass Communications, Inc.*

**Certificate of Service**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 28, 2017.

/s/ Mitchell J. Matorin